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ATTORNEY FOR RIVERSIDE COUNTY, CALIFORNIA TREASURER AND TAX COLLECTOR  
CALIFORNIA TAXING AUTHORITY

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

IN RE:

Chapter 11

§

CIRCUIT CITY STORES, INC., et al.

Case No. 08-35653-KRH

§

Debtors.

Jointly Administered

**MOTION OF A. CARTER MAGEE, JR. FOR AN ORDER  
AUTHORIZING MARTHA E. ROMERO TO APPEAR *PRO HAC VICE*  
PURSUANT TO LOCAL BANKRUPTCY RULE 2090-1(E)(2)**

A. Carter Magee, Jr. (the “Movant”), a member in good standing of the Bar of the Commonwealth of Virginia, an attorney admitted to practice before the United States Bankruptcy Court for the Eastern District of Virginia (the “Court”), and a partner with Magee, Foster, Goldstein & Sayers, P.C., hereby moves this Court to enter an order authorizing, Martha E. Romero, General Counsel for the Riverside County, California Treasurer and Tax Collector, secured creditors and administrative claimants, pursuant to ad valorem property taxes in the above-captioned chapter 11 bankruptcy cases pursuant to Rule 2090-1 (E)(2) of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Eastern District of Virginia (the “Local Bankruptcy Rules”). In support of the Motion, the Movant states as follows:

1. Martha E. Romero is admitted, practicing, and in good standing as a member of the bar of the State of California and Arizona. Ms. Romero has been practicing law since 1987. There are no disciplinary proceedings pending against her.

**WAIVER OF MEMORANDUM OF LAW**

2. Pursuant to Local Bankruptcy Rule 9013-1(G), and because there are no novel issues of law presented in this Motion, the Movant requests that this Court waive the requirement that all motions be accompanied by a written memorandum of law.

**NO PRIOR REQUEST**

3. No prior request for the relief sought herein has been made to this Court in these bankruptcy cases or to any other court.

4. I, A. Carter Magee, Jr., am a member of this bar and I, or another attorney in my firm that is a member of the bar of this Court, will appear with Ms. Romero at all hearings she attends.

**WHEREFORE**, A. Carter Magee, Jr., respectfully requests that this Court enter an order substantially in the form of the proposed order attached as Exhibit A: (i) authorizing Martha E. Romero to appear *pro hac vice* in association with the Movant as attorney for the Riverside County, California Treasurer and Tax Collector in connection with the above-captioned chapter 11 cases and (ii) granting such other and further relief as is just and proper.

Dated: January 15, 2009

Respectfully submitted,

/s/ A. Carter Magee, Jr.

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CERTIFICATE OF SERVICE

I certify that on January 15, 2009, I served copies of the above Objection to the Sale Motion by electronic mail on the entities comprising the Primary Service List (as defined in Exhibit A to the Order dated November 12, 2008, governing notice procedures).

By: /s/ W. Joel Charboneau

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